

# EXHIBIT A



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<p>AHMED F. ELSAYED-SHAHIN</p> <p>Plaintiff,</p> <p>v.</p> <p>GREGORIO MUNIZ-JUSINO, DELTAWASH SC, LLC., JOHN DOE AND JANE DOES (1 TO 10), ABC COMPANY AND XYZ CORPORATIONS 1 TO 10 (Fictitious names).</p> <p>Defendant.</p>	<p>SUPERIOR COURT OF NEW JERSEY          LAW DIVISION: MIDDLESEX COUNTY</p> <p>DOCKET NO.: MID-L- MID-L-8396-18</p> <p>CIVIL ACTION</p> <p>COMPLAINT</p>
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Plaintiff, Ahmed F. Elsayed-Shahin residing 27 Roanoke Street, Woodbridge, New Jersey 07095, by way of Complaint against the Defendant, says:

#### THE PARTIES AND VENUE

1. Plaintiff, Ahmed F. Elsayed-Shahin residing 27 Roanoke Street, Woodbridge, New Jersey 07095.
2. Defendant, Gregorio Muniz- Jusino, is an individual residing at 9632 Hamilton Boulevard, Breinigsville, PA, 18031.
3. Defendant, Deltawash SC, LLC., is a company doing business at 1357 Enterprise Avenue, Myrtle Beach, South Carolina, 29577.

**FACTS RELEVANT TO ALL COUNTS**

4. On March 9, 2017, Plaintiff Ahmed F. Elsayed-Shahin was the driver of the vehicle, a 2011 Hyundai with a vehicle identification number ("VIN") 5NPEB4AC9BH182562 ("Vehicle") that bears a New Jersey license plate number of "R56GXU".
5. Defendant Gregorio Muniz- Jusino was the driver of a 2004 Freightliner Truck with a vehicle identification number ("VIN") 1FVAGWDC54HN54701 ("Vehicle") that bears a New Jersey license plate number of "P509245".
6. Defendant Deltawash SC, LLC., was the owner of a 2004 Freightliner Truck with a vehicle identification number ("VIN") 1FVAGWDC54HN54701 ("Vehicle") that bears a New Jersey license plate number of "P509245".
7. On March 9, 2017, Plaintiff Ahmed F. Elsayed-Shahin was the driving the vehicle on Finnegans Lane and Petunia Drive, North Brunswick.
8. Meanwhile, Defendant Gregorio Muniz- Jusino struck Plaintiff's vehicle on Finnegans Lane and Petunia Drive, North Brunswick.
9. As a result of the violent collision caused by the Defendant Gregorio Muniz- Jusino 's vehicle, Plaintiffs suffered bodily injuries.
10. An officer from the North Brunswick Police Department arrived at the scene of the accident and completed the Police Crash Investigation Report ("Police Report") (presented herein as Exhibit 1).
11. The Plaintiffs suffered severe and permanent injuries in the accident and subsequently received, and continues to receive, extensive physical therapy and treatment on a regular basis.

**COUNT ONE**

12. Plaintiff refers to and incorporates herein the General Allegations stated in Paragraphs 1 through 11 alleged herein above, and make them a part hereof as though set forth at length.
13. At the same time and place mentioned in ¶¶ 4 to 9, Defendant Gregorio Muniz- Jusino breached a duty to drive carefully and safely by driving in a careless, reckless, and negligent manner.
14. Defendant Gregorio Muniz- Jusino actions were the proximate cause of the Plaintiff's injuries because it is reasonably foreseeable that driving in a careless, reckless, and negligent manner is likely to rear-end a car in front of it and harm other persons and properties.
15. Defendant Gregorio Muniz- Jusino actions were the actual cause of the Plaintiff's injuries because Plaintiff's vehicle was violently struck when Defendant Gregorio Muniz- Jusino was driving in a careless, reckless, and negligent manner.
16. Plaintiff suffered damages because they suffered serious bodily injuries as a result of Defendant Gregorio Muniz- Jusino 's carelessness, recklessness, and negligence.
17. As a direct and proximate result of the physical injuries sustained by Plaintiff in the collision, he may be left with disabilities that will, in the future, similarly incapacitate him and cause him permanent pain and suffering, and may require extensive medical treatment.

**WHEREFORE**, Plaintiffs demands judgment from Defendants Gregorio Muniz- Jusino:

- A. Damages for physical pain and suffering.
- B. Damages for the medical bills from the diagnosis, treatment and care.
- C. Compensatory damages for lost wages for missed days of work
- D. Any additional compensatory and incidental damages.
- E. Attorney's fees and costs in connection with this action; and
- F. Such other relief as this Court deems just and equitable.

**COUNT TWO**

18. Plaintiff, Ahmed F. Elsayed-Shahin repeats, reiterates and realleges the allegations of the First Count of this Complaint as if set forth at length herein.
19. Defendants, JOHN/JANE DOES 1-10 and/or ABC CORP. 1-10, are fictitious names pleaded as Defendants whose identities are unknown to the Plaintiff at this time.
20. Defendants, ABC CORP. 1-10 and/or JOHN/JANE DOES 1-10 (names being fictitious and presently unknown), are named as defendants herein and intended to represent any individual(s), company(ies), partnership(s), corporation(s), or other business entity(ies), whose identity is presently unknown, who may have contributed to the negligence in causing this automobile collision, or that may be otherwise liable for payment of damages for the negligence and/or recklessness of others.
21. On March 9, 2017, Defendants, Gregorio Muniz- Jusino, Deltawash SC, LLC., and/or JOHN/JANE DOES 1-10, were the operators and/or permissive users and/or agents and/or servants and/or employees of the individual in control of Defendants' vehicle.
22. At the same aforementioned date, Defendants, Deltawash SC, LLC. and/or ABC CORP. 1-10, were the individuals or entities that owned, leased, rented, possessed, maintained, operated and/or were otherwise in control of the motor vehicle operated by Defendant, Gregorio Muniz- Jusino and/or JOHN/JANE DOES 1-10.

**WHEREFORE**, Plaintiff, Ahmed F. Elsayed-Shahin demands judgment against the Defendants, Gregorio Muniz- Jusino, Deltawash SC, LLC., ABC CORP. 1-10 and/or JANE/JOHN DOES 1-10, individually, jointly and severally or in the alternative, in the amount of her damages together with interest and costs of suit.

**COUNT THREE**

23. Plaintiff, Ahmed F. Elsayed-Shahin repeats, reiterates and realleges the allegations of the First and Second Counts of this Complaint as if set forth at length herein.
24. As a direct and proximate result of the negligence of all Defendants, Plaintiff Ahmed F. Elsayed-Shahin was caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization, medication, and surgical intervention and has been and will in the future continue to be hampered in his daily routine due to the permanent nature of their injuries.
25. As a direct and proximate result of the negligence of all Defendants, Plaintiff Ahmed F. Elsayed-Shahin has been forced to incur medical expenses, including but not limited to liens, deductibles, and out-of-pocket expenses, which were usual, customary reasonable, necessary, and causally related to the subject accident
26. As a result of these actions, Plaintiff, Ahmed F. Elsayed-Shahin has suffered damages.

**WHEREFORE**, Plaintiff, Ahmed F. Elsayed-Shahin, demands judgment against the Defendants, Gregorio Muniz- Jusino, Deltawash SC, LLC., ABC CORP. 1-10 and/or JANE/JOHN DOES 1-10, individually, jointly and severally or in the alternative, in the amount of their damages, including payment of medical bills, together with interest and costs of suit.

**CERTIFICATION PURSUANT TO R. 4:5-1**

I hereby certify, pursuant to Rule 4:5-1, that the matter in controversy herein is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I further certify that I am unaware of any other party who should be joined in this action.

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*/s/ Ihab Ibrahim*

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Ihab A. Ibrahim, Esq.  
Attorneys for Plaintiffs

Dated: December 17, 2018

**CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)**

I certify that confidential personal identifier have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(c).

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*/s/ Ihab Ibrahim*

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Ihab A. Ibrahim, Esq.  
Attorneys for Plaintiffs

Dated: December 17, 2018

**JURY DEMAND**

The Plaintiffs, Ahmed F. Elsayed-Shahin hereby demands trial by jury as to all issues in the above-captioned matter.

**DESIGNATION OF TRIAL COUNSEL**

PLEASE TAKE NOTICE that Ihab A. Ibrahim, Esq. is hereby designated as trial counsel in the above-captioned matter.

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*/s/ Ihab Ibrahim*

Ihab A. Ibrahim, Esq.  
Attorneys for Plaintiffs

Dated: December 17, 2018